

REMARKS

Claims 2-4, 7-9, and 11-16 are currently pending in the present patent application, with claims 1, 5-6, 10, and 17-29 having been previously cancelled. Claim 9 was allowed by the Examiner in the Office Action.

Claim 14 was objected to by the Examiner but indicated as allowable if appropriately rewritten in independent form. Claim 14 has been so rewritten and is therefore now allowable. Rewriting dependent claim 14 in independent form, as was previously done for claims 7 and 11, should not be construed as narrowing the scopes of these claims. The prior response erroneously indicated such amendments to claims 7 and 11 should be considered as narrowing amendments. These amendments to claim 14 do not narrow the scope of claim 14 but merely expressly incorporate limitations that were effectively incorporated by reference when this claim was written in dependent form. Claim 15 has also been amended to include limitations set forth in claim 9 and is therefore allowable for at least the same reasons as claim 9.

In the Office Action, the Examiner rejects claims 1-6 8, 10, and 15-18 under 35 U.S.C. § 103(a) as being unpatentable over Applicant's prior art ("APA") of Figure 1 and in view of U.S. Patent Application Publication No. 20030076159A1 to Shor *et al.* ("Shor") and U.S. Patent No. 6,605,995 to Toda ("Toda"). Only claims 2-4, 7-9, and 11-16 are pending in the present application, and it is assumed in this response that this rejection applies to all these claims except claims 9 and 14, which appears to be the case based upon the Examiner's specific comments regarding the pending claims.

Independent claim 7 recites a voltage reference generator circuit for generating a reference voltage of a predetermined value that includes first circuitry adapted to generate a first voltage which is substantially independent of temperature and related to a component parameter susceptible to variations with process technology. Second circuitry is adapted to generate an offset voltage of a value such that the sum of the first voltage and the offset voltage is said predetermined value. The second circuitry includes components whose parameters are variably selectable without affecting the first voltage and further includes current generating circuitry that includes a current source and a bipolar transistor connected in series between upper and lower supply rails.

Toda is directed to a differential amplifier circuit and not to voltage references or voltage generators. Figure 3 illustrates a PNP transistor QP3 that functions as a current source to supply current to a PNP transistor QP2. An NPN transistor QN2 is coupled in series with the transistor QP2, with the three transistors QP3, QP2, and QN2 being coupled in series between an upper power supply VDD and a lower power supply VSS.

Referring now to claim 7, this claim recites “a current source and a bipolar transistor connected in series between upper and lower supply rails.” Even assuming Toda can be properly combined with APA and Shor, Toda does not disclose this recited structure. The transistors QP3 and QP2 are not coupled in series between VDD and VSS, but instead are coupled in series between VDD and transistor QN2.

In combining Shor and Toda, the Examiner proposes to replace the “differential amplifier [of Toda with Shor’s] differential amplifier B2.” The component B2 in Shor is not a differential amplifier but instead is a buffer, which is how Shor refers to this component. See, e.g., ¶ 82, line 4. The buffer B2 is an operational amplifier connected in a unity follower configuration and does not function as a differential amplifier. There must be some motivation to combine references when doing so to form an obviousness rejection. The buffer B2 in Shor is not functioning as a differential amplifier and one skilled in the art would not have any motivation, or reason, for combining Shor and Toda. The Examiner states the motivation is “improving the performance of the modified prior art of [F]igure 1.” See, Office Action, pg. 3, line 5. If such a motivation were acceptable, then any combination of references could be combined at will by Examiners. Engineers, scientists, and those working in technology are nearly always trying to improve the performance of some prior art device. Such a motivation is not sufficient under Section 103. Hindsight reconstruction of the invention by the Examiner through the combination of multiple prior art references is not permissible.

For all these reasons, claim 7 is allowable. All dependent claims are allowable for at least the same reasons as the independent claims from which they depend and due to the additional limitations added by each of these dependent claims.

Enclosed herewith is a Certified copy of the Priority Document.

The present patent application is in condition for allowance. Favorable consideration and a Notice of Allowance are respectfully requested. Should the Examiner have any further questions about the application, Applicant respectfully requests the Examiner to

contact the undersigned attorney at (425) 455-5575 to resolve the matter. If any need for any fee in addition to that paid with this response is found, for any reason or at any point during the prosecution of this application, kindly consider this a petition therefore and charge any necessary fees to Deposit Account 07-1897.

Respectfully submitted,

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